

**UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO**

In re:

The Financial Oversight and Management Board for Puerto Rico,

As representative of

The Commonwealth of Puerto Rico, the Employee Retirement System of the Government of the Commonwealth of Puerto Rico, and the Puerto Rico Public Buildings Authority

Debtors

PROMESA Title III

No. 17 BK 3283 (LTS)

(Jointly Administered)

**MOTION ADDING CERTIFIED TRANSLATION OF RESOLUTION OF THE
COURT OF FIRST INSTANCE**

TO THE HONORABLE COURT:

By counsel, excepting Javier Mandry Mercado, Oscar Adolfo Mandry Aparicio; María del Carmen Amalia Mandry Llombart; Selma Verónica Mandry Llombart; María del Carmen Llombart Bas; Oscar Adolfo Mandry Bonilla; Gustavo Alejandro Mandry Bonilla; Yvelise Helena Fingerhut Mandry; Margaret Ann Fingerhut Mandry; Victor Robert Fingerhut Mandry; Juan Carlos Esteva Fingerhut; Pedro Miguel Esteva Fingerhut; Mariano Javier McConnie Fingerhut; Janice Marie McConnie Fingerhut, Victor Michael Fingerhut Cochran; Michelle Elaine Fingerhut Cochran; Rosa Estela Mercado Guzmán; Eduardo José Mandry Mercado; Salvador Rafael Mandry Mercado; Margarita Rosa Mandry Mercado; Adrián Roberto Mandry Mercado members of the estate of Pastor Mandry Mercado (hereafter collectively designated as “Sucesión Mandry Mercado”), through its undersigned counsel and respectfully states and requests:

1. On August 14, 2019, Sucesión Mandry Mercado filed a Memorandum of Costs with the Court of First Instance of Puerto Rico, Superior Section of Ponce (the “Court of First Instance”) in Civil Number JAC-2008-0853 in reference to the inverse condemnation judgment entered by the Court of First

Instance on August 6, 2019, as amended on December 19, 2019, in favor of Sucesión Mandry Mercado for \$30,496,000.00 (the “Judgment”).

2. On August 22, 2019, the Court of First Instance notified the parties that it would reserve its ruling on the Memorandum of Costs until the Judgment became final and firm.

3. As it appears from **ECF No. 18994-2** and **20528-2**, the Judgment became final and firm on April 1, 2022.

4. Sucesión Mandry Mercado is forwarding herewith the resolution of the Court of First Instance in Spanish with a certified translation to the English language granting the Memorandum of Costs in the amount of \$20,522.24, entered on December 14, 2022.

WHEREFORE, it is respectfully requested that the attached resolution of the Court of First Instance and its certified translation to the English be directed to be made part of the record of this case and that proof of claim number 179550 be deemed amended by adding thereto the costs granted by the Court of First Instance in the amount of \$20,522.24.

CERTIFICATE OF SERVICE: I hereby certify that on this date, I electronically filed the foregoing motion with the Clerk of the Court using the EM/ECF system, which will send a notification to all attorneys of record.

San Juan, Puerto Rico, this 9th day of January 2023

s/CHARLES A. CUPRILL-HERNÁNDEZ
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